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December 22, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

RE: *United States of America v. Eric Steadman*
22 Cr 640 (KMK)

Honorable Karas,

As you know I have been assigned to represent Mr. Eric Steadman in the above-captioned multi-defendant criminal matter. I write to request the appointment of Ms. Meusette Gonzalez, Paralegal Specialist, to assist in the defense in this criminal matter. Ms. Gonzalez's appointment is critical to the adequate preparation of Mr. Steadman's defense and would be in the interest of justice. Ms. Gonzalez is a Paralegal trained to conduct comprehensive legal interviews, organize discovery/files for trial purposes and perform legal research, among other skills. Ms. Gonzalez has been previously assigned to numerous criminal cases in the Southern District of New York and has been approved by the Bureau of Prisons to conduct in-person and video/telephone conferences.

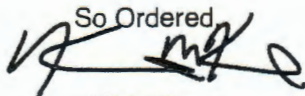
Mr. Steadman is charged in a superseding indictment (S3) which include the charges of: Racketeering Conspiracy, Narcotics Trafficking, Possession of a Firearm in Connection with a Drug Trafficking Crime and Assault with a Dangerous Weapon and Attempted Murder In Aid of Racketeering Conspiracy and Discharge of a Firearm in Connection with a Crime of Violence.

The discovery in this case is quite voluminous with over a Terabyte worth of discovery including but not limited to a significant amount of pages of social media accounts, text messages, pole camera footage, as well as cellphone data. The government has made multiple productions thus far via Discovery Coordinator Julie De Almeida. Pursuant to Second Circuit CJA Policy and Procedure Manual, Chapter II § (2)(A)(1)(c) - *Services Which are Compensable - Support Required*, and in light of Ms. Gonzalez's extensive experience I respectfully request that Ms. Gonzalez be appointed at her rate of \$75.00 per hour for a maximum of 200 hours. I believe Ms. Gonzalez would be of valuable assistance to my defense team in representing Mr. Steadman in light of her experience, the complexity of this matter and in the interest of justice.

I thank the Court in advance for its consideration.

Granted.

So Ordered



12/26/23

Sincerely,
DONALDSON & CHILLIEST, LLP

Xavier R. Donaldson
Xavier R. Donaldson, Esq.